



For a thriving New England

CLF Vermont

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April 16, 2014

*Via U.S. Certified Mail, Return Receipt*

Gina McCarthy, Administrator  
Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington D.C. 20460

Re: Conservation Law Foundation, Inc., v. William Z. Derosia, Jr. d/b/a Great Brook Lumber Company  
United States District Court for the District of Massachusetts, Case No.1:14-cv-10126

Dear Administrator McCarthy:

Counsel for Plaintiff, Conservation Law Foundation (“CLF”), provides the attached proposed consent decree between CLF and William Z. Derosia, Jr. d/b/a Great Brook Lumber Company (“Great Brook Lumber”), resolving alleged violations of the Clean Water Act and the EPA-issued Industrial Multi-Sector General Permit for Stormwater Discharges (MSGP) pursuant to 33 U.S.C. § 1365(c)(3), as set out in the attached complaint. Pursuant to the consent decree, the parties intend to file a joint motion for entry of consent judgment with the United States District Court for the District of Massachusetts. This motion will be brought before the Court following the 45-day period for U.S. government review of the consent decree required by 40 C.F.R. §135.5(b).

The consent decree provides that Great Brook Lumber will make a supplemental environmental project payment of \$8,000 to Westfield River Watershed Association, Inc., P.O. Box 1764 Westfield, MA 01086 for environmental restoration of or other environmental benefit to the Westfield River watershed. We are in the process of obtaining written confirmation (“SEP Recipient Letter”) from Westfield River Watershed Association, Inc. that it (1) has read the consent decree; (2) will spend any monies it receives under the consent decree for the purposes specified in the consent decree; (3) is a 501(c)(3) tax-exempt organization; and (4) will not use any money received under the consent decree for political lobbying activities. I will instruct Westfield River Watershed Association, Inc. to mail the SEP Recipient Letter directly to the DOJ Citizen Suit Coordinator. Please feel free to contact Westfield River Watershed Association, Inc. at:

Westfield River Watershed Association, Inc.  
Attn: Brian Conz, President  
bconz@westfield.ma.edu

P.O. Box 1764  
Westfield, MA 01086

By submitting this consent decree as requested, counsel for Plaintiff asks the United States to promptly review the agreement and, if it does not object to dismissal of this action, to so notify the Court.

If you have any questions or concerns regarding this matter, please contact me.

Respectfully submitted,

ATTORNEY FOR PLAINTIFF  
CONSERVATION LAW FOUNDATION

/s/ Zachary K. Griefen  
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cc (cover letter only, via email):

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